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May 24, 2005

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VIA HAND DELIVERY

Marlene H. Dortch, Esq., Secretary
Federal Communications Commission
236 Massachusetts Ave., NE
Suite 110
Washington, DC 20002
Attn: Media Bureau, Audio Division (Nonfeeable Application)

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Federal Communications Commission
Office of Secretary

Re: MM Docket No. 99-325
WRAL-FM, Raleigh, NC
FRN: 0001942606
*Application for Experimental Broadcast Authority to
Offer Multiple Digital Audio Channels*

Dear Ms. Dortch:

WRAL FM, Inc., the licensee of WRAL-FM, Raleigh, North Carolina, Facility ID No. 73920 ("WRAL"), by its counsel and pursuant to Section 73.1510 of the Commission's rules, 47 C.F.R. § 73.1510, hereby respectfully requests an experimental authorization to transmit a hybrid digital signal incorporating multiple channels within WRAL's service area. By *Public Notice* dated March 8, 2005, the Commission announced that such experimental requests may be filed through informal application.¹

As the Commission is aware, WRAL and its affiliates have a long history of being pioneers in broadcast technology. WRAL's parent company, Capitol Broadcasting Company, Inc. ("CBC"), played an instrumental role in the original digital television experiments. In that role, CBC submitted reports to the Commission summarizing the results of CBC's field tests of digital television transmissions. Indeed, CBC's flagship television station, WRAL-DT, was the first station in the United States to transmit digital television signals pursuant to an experimental authorization. In keeping with that tradition, WRAL is now

¹ *Commission Clarifies Policy Regarding Multiple Audio Streams in IBOC Transmissions*, Public Notice, MM Docket No. 99-325, DA 05-609, at 2 (rel. Mar. 8, 2005) ("*Public Notice*").

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proposing to experiment with multiple digital radio channels and provide to the Commission information gathered through its experiments, in an effort to broaden the Commission's and industry's knowledge of the potential for multiple digital audio transmissions.

WRAL has already notified the Commission of its hybrid digital signal operations, using the in-band, on-channel ("IBOC") technology developed by iBiquity Digital Corporation ("iBiquity").² If the requested experimental authorization is granted, WRAL intends to split the WRAL digital signal into a main digital audio channel and one or more secondary digital audio channels. This experiment will involve a modification of the audio coder system to divide the digital audio stream into multiple channels. No other changes to WRAL's IBOC operations are proposed.

Frequency Assignment

WRAL requests authority to operate its experimental station using WRAL's assigned analog frequency of 101.5 MHz. WRAL's emissions and occupied channel bandwidth will remain unchanged and in compliance with the IBOC FM transmission standards approved by the Commission.³ The secondary digital audio channel(s) will be transmitted via WRAL's authorized antenna with no change in its analog or digital effective radiated power.

Commencement of Operations and Hours of Operation.

WRAL proposes a commencement date of June 1, 2005. WRAL requests a one (1) year authorization to conduct the experimental broadcasting proposed herein. In order to maximize the usefulness of WRAL's experimentations, WRAL requests authority to operate the station without limitation or restriction on the number of hours in which it may operate each day.

² See Letter from Ardie Gregory, Vice President/General Manager, WRAL-FM, to Marlene H. Dortch, Secretary, FCC (filed Mar. 27, 2003); see also Letter from David A. O'Connor, counsel for WRAL-FM, to Marlene H. Dortch, Secretary, FCC (filed May 14, 2003).

³ *Digital Audio Broadcasting Systems and Their Impact on the Terrestrial Radio Broadcast Service*, First Report and Order, MM Docket No. 99-325, FCC 02-286, 17 FCC Rcd 19990, App. B (rel. Oct. 11, 2002) ("*First Report and Order*").

Program of Research and Experimentation

iBiquity has worked with the Commission for several years to develop the transmission standards for IBOC, and the Commission's *First Report and Order* is an important step in that process. However, as the Commission acknowledged in the *First Report and Order*, the IBOC standards and procedures adopted in that Order are interim only, and are subject to finalized rules. WRAL's research and experimentation will further radio's technological boundaries by expanding the industry's knowledge of digital IBOC operations and potential limitations, and the results of this experimentation will be an important contribution to the Commission's ongoing review of digital radio.

Finally, WRAL confirms that the program of research and experimentation will be conducted by qualified personnel. WRAL engineers have decades of experience in the broadcast field. WRAL's engineers are prepared to compile and submit such reports for analysis as the Commission's staff determines to be useful.

No Charges for Program Service

No charges may be made, either directly or indirectly, in connection with the operation of an experimental station. 47 C.F.R. § 73.1510(c)(6). WRAL's analog station is a commercial FM station and, as such, the station imposes charges on its advertisers. WRAL proposes to continue imposing these normal charges for the programming transmitted on WRAL's analog signal and main digital signal during the period of experimental authorization. No additional charges will be imposed, either directly or indirectly, as a result of secondary channel digital operations.

A Grant of the Application Will Serve the Public Interest

As the Commission noted in the *First Report and Order*, there is a substantial public interest in the efficient and rapid introduction of IBOC technology. WRAL's proposed research on multiple digital channel transmissions will facilitate development of a record of operation with such transmissions, which will provide the Commission with important information on various methods for implementing IBOC as well as any potential interference issues. The results will be important contributions to a more efficient and rapid deployment of IBOC technology.

Anti-Drug-Abuse Certification and General Showing of Compliance

I am authorized to certify, on behalf of WRAL, that neither WRAL nor any other party to this application is subject to a denial of Federal Benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862A. I am also authorized to certify that WRAL is in compliance with all other general requirements of the Communications Act of 1934, as amended.

Application Fee

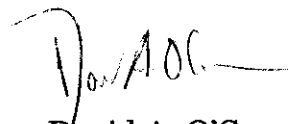
No application fee is required for this application, according to the *Public Notice*.

An extra copy of the filing is enclosed. Please date-stamp the extra copy and return it to the courier.

In the event there are any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

HOLLAND & KNIGHT LLP

A handwritten signature in black ink, appearing to read "D. A. O'Connor", with a horizontal line extending to the right.

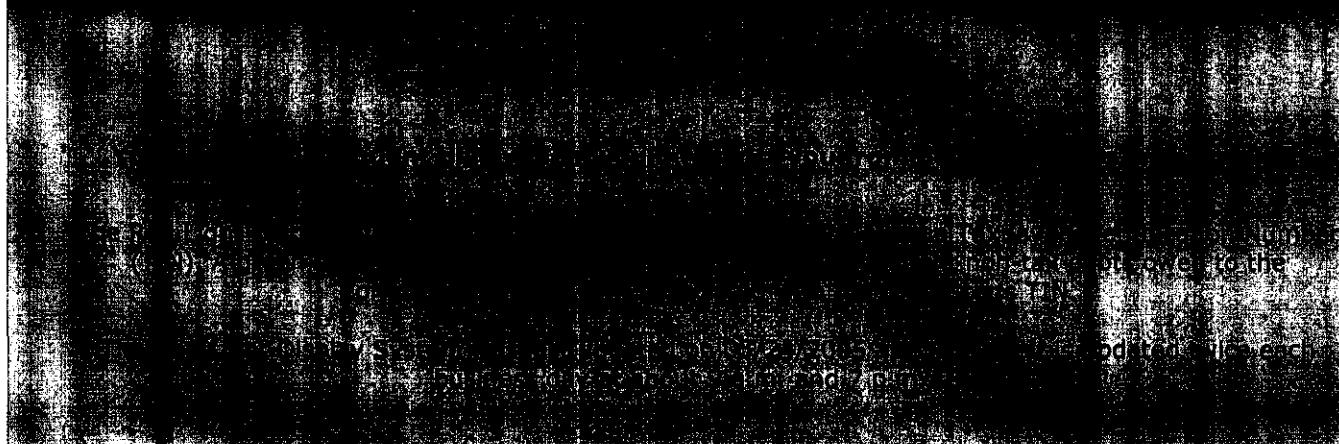
David A. O'Connor
Counsel for WRAL FM, Inc.

Enclosure

cc (via e-mail): Ann Gallagher, Esq.
 Charles (Norm) Miller

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Communications
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I, David O'Connor certify that the FCC Registration Number (FRN) listed below is true and correct to the best of my knowledge, information and belief.

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